

**REMARKS**

1. Applicant thanks the Examiner for his findings and conclusions.
2. It should be appreciated that Applicant has elected to amend claims 1, 14, 20, and 24 solely for the purpose of expediting the patent process in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00). In making such amendments, Applicant has not and does not in any way narrow the scope of protection to which the Applicant considers the invention herein entitled. Rather, Applicant reserves Applicant's right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

**Hilton Davis / Festo Statement**

The amendments herein were not made for any reason related to patentability. As for Claims 1, 14, 20, and 24 changes were implemented to correct grammatical errors. As for Claims 1 and 20, changes were implemented to comply with standard claim drafting practices. None of the foregoing amendments is related to the pending rejections; all amendments were made for reasons other than patentability.

3. Claims 1-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Boguraev, U.S. patent no. 6,212,494 (hereinafter Boguraev) in view of Bertram, U.S. patent no. 5,818,446 (hereinafter Bertram).

As to Claims 1-35, Applicant respectfully disagrees.

First, as to Claims 1, 14, 20, 24, and 30 Bertram and Boguraev do not combine to teach all of the limitations of the invention. The claimed invention uses a specific user interface. Grammatical sentences or phrases are generated based upon information gathered from the specific user interface. In stark contrast, Bertram displays information into a user interface. Fundamentally, the processes are different. The claimed invention is to gathering input from the user to generate a data file. In stark contrast, Bertram is providing data to the user into a selected interface. As the examiner points out, Boguraev does not teach generating grammatical sentences from the specific user interface. Hence, Boguraev does not teach generating grammatical sentences from the specific user interface and Bertram is to the fundamentally different process of providing to a user rather than gathering information from the user. Hence, the combination of Boguraev and Bertram can not teach the step of generating grammatical sentences from the user specific interface. Accordingly, the rejection of independent Claims 1, 14, 20, 24, and 30 35 U.S.C. § 103(a) over Boguraev, in view of Bertram and all claims dependent therefrom is deemed improper.

Second, Bertram is non-analogous art and can not be combined with Boguraev. Boguraev is directed at the process of stripping markup tags, linguistically analyzing and annotating the text, disambiguating between possible parts-of-speech, and syntactically analyzing and labeling each word. In stark contrast, Bertram is directed toward selecting the proper user interface for display. Bertram provides data to the user into a selected display. Specifically, Bertram teaches providing a functionally rich user interfaces for adults and providing a simplified user interface for children. Hence, Boguraev and Bertram are different in terms of structure and function. This contrast is supported by the U.S. Patent and Trademark Office classifications of Boguraev and Bertram. Boguraev is placed into classes 704 and 707 by the U.S. Patent and Trademark Office. Class 704 is for apparatus and corresponding methods for constructing, analyzing, and modifying units of human language by data processing. Class 707 has three

main divisions: database and file accessing, database schema and data structure, and file and database maintenance. In stark contrast, Bertram is placed into class 345 by the U.S. Patent and Trademark Office, which is defined as a class that provides processes and apparatus for selective electrical control of two or more light-generating or light-controlling elements. The classification of Boguraev as modifying units of human language into data structures is distinct from the classification of Bertram as selective output control. Further, the claimed invention is in the field of transforming and canonicalizing semantically structured data. Grammatical sentences are generated according to information in a specific user interface. In stark contrast, Bertram is in the field of selecting electrical output. Bertram teaches selecting between a functionally rich user output for adults and a simplified user output for children. One skilled in the art would not look to methods of display when seeking methods of input. Particularly, one skilled in the art of transforming and canonicalizing semantically structured data would not look to the field of providing alternative display of a functionally rich user interfaces for adults and a simplified user interface for children. Hence, Boguraev and Bertram have both differences in structure and function of the invention and are non-analogous to each other. Similarly, Bertram is non-analogous to the claimed invention. Accordingly, the rejection of Claims 1, 14, 20, 24, and 30 under 35 U.S.C. § 103(a) over Boguraev, in view of Bertram, and all claims dependent therefrom is deemed improper.

Additionally, as to Claims 1, 14, 20, 24, and 30, the combination of Boguraev with Bertram is improper use of hindsight. Applicant respectfully objects to the Examiner's comment that "Therefore, it would have been obvious to a person having ordinary skill in the art at the time of [that] the invention was made to modify Boguraev by incorporating ... Bertram. Thus, one having ordinary skill in the art at the time the invention was made would have been motivated to use such a modification because that would provide Boguraev's system the enhanced capability of providing information on multiple different (specific) user interface[s]." The examiner concludes that one would be motivated to use the

combination of Bertram with Boguraev as the combination would provide the enhanced capability of the invention. This is improper hindsight. According to MPEP 2143.01, there must be some suggestion or motivation in either the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine reference teachings. The invention itself can not be the motivation for combining references. Accordingly, the rejection of Claims 1, 14, 20, 24, and 30 under 35 U.S.C. § 103(a) over Boguraev, in view of Bertram, and all claims dependent therefrom is deemed improper.

Still further, as to Claims 1, 14, 20, 24, and 30, Boguraev and Bertram can not be logically combined. As the Examiner states, Boguraev does not disclose generating grammatical sentences from the specific user interface. Even if Boguraev disclosed using a specific user interface, Boguraev would require user input. In stark contrast, the system described by Bertram provides output. The output of Bertram would not solve the input requirement of Boguraev. No combination of output of Bertram would solve the missing input needs of Bertram. As Boguraev and Bertram can not be logically combined, the rejection of Claims 1, 14, 20, 24, and 30 under 35 U.S.C. § 103(a) over Boguraev, in view of Bertram, and all claims dependent therefrom is deemed improper.

Additionally, Claims 1 and 14 and all claims dependent therefrom are limited to transforming and canonicalizing semantically structured data. This limitation is not addressed in either Boguraev or Bertram and no rejection has been made based upon this claim limitation.

Still further, as to Claims 1, 14, 20, 24, and 30, the examiner cites col. 42, lines 10-35 of Boguraev as prior art to "applying text patterns to the obtained data". Applicant respectfully disagrees. In fact, Boguraev teaches identifying the correct use of each word by identifying syntactic patterns or a proper part-of-

speech for certain terms. In particular, Boguraev teaches identifying if a particular word within a phrase is a noun or a verb. In stark contrast, the invention claims applying text patterns to the obtained data. A text pattern does not parse words into parts-of-speech. Bertram does not teach text patterns. As neither Boguraev nor Bertram teach text patterns, the rejection of Claims 1, 14, 20, 24, and 30 under 35 U.S.C. § 103(a) over Boguraev, in view of Bertram, and all claims dependent therefrom is deemed improper.

In view of the above concerning independent Claims 1, 14, 20, 24, and 30, all remaining rejections to claims respectively dependent therefrom are deemed to be overcome.

4. Claims 1, 14, 20, and 24 are amended to correct grammatical errors.
5. Claims 1 and 20 are amended to comply with standard claim drafting practices.
6. New Claims 36-42 are added to the Application.

Support for the new claims 36 is found in at least in original Claim 1, Figure 30, and at page 11, lines 3-4. Support for the new Claim 37 is found at least in the application as filed at page 12, lines 12-14. Support for the new Claim 38 is found at least in Figure 1. Support for the new Claim 39 is found at least in the application as filed at page 11, lines 15-19. Support for the new Claim 40 is found at least in the application as filed at page 12, lines 12-14. Support for the new Claim 41 is found at least in the application as filed at page 12, line 24 – page 13, line 6. Support for the new Claim 42 is found at least in the application

as filed at page 13, lines 8-12. Applicant certifies that no new matter was added by way of the new claims.

**CONCLUSIONS**

In view of the above, this application is deemed to be in allowable condition. The Examiner is therefore earnestly requested to withdraw all outstanding rejections, allowing the application to pass to issue as a United States Patent. The Commissioner is hereby authorized to charge \$350 for seven new claims, and any additional fees due or credit any overpayment to Deposit Account No. 07-1445. Should the Examiner have any questions regarding the application, he is respectfully urged to contact Applicant's attorney at (650) 474-8400.

Respectfully submitted,



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